



# Environmental Protection Agency

2200 Churchill Road, Springfield, Illinois 62706

N.

217/782-6760

Refer to: Will County - Lemont/Lemont Manufacturing Company

December 31, 1980

Richard L. Cline, Secretary  
Lemont Manufacturing Company  
Division of the CECO Corporation  
Box 280  
Lemont, Illinois 60439

RECEIVED



Gentlemen:

This will acknowledge receipt of your application for permit to develop a waste management site, dated November 19, 1980 and received by this Agency on November 21, 1980.

A review of the application has been completed and the following comments are made pursuant to that review:

Your application is incomplete (Rule 205-a\*).

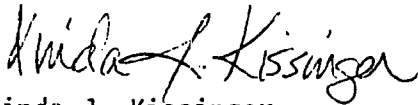
1. Names and addresses of adjacent landowners shall be provided for notification purposes, Item 32 (Rule 205-a\*).
2. Plan sheets must be submitted as described in Items 23 and 24 (Rule 205-a\*).
3. Location and depth of wells mentioned in response to Item 17 shall be provided. Plot wells on the topographic quadrangle map (Rule 205-a\*).
4. Items 19, 20 and 21 shall be conducted for the soil types encountered at the site (Rule 205-a\*).
5. What is the volume (cubic yards) of the waste stored in the two pits? (Rule 205-a\*)
6. Storage of waste in the land is treated as land disposal for purposes of this application. All of Part III of the application must be completed. We acknowledge the monitoring well borings submitted. (Rule 205-a\*)
7. The two existing baghouse dust pits are unlined and situated on and in limestone. Hazardous waste shall no longer be stored or disposed in them. The Agency requires 10 feet of clay with a permeability of  $1 \times 10^{-8}$  cm/sec. to be used for berms and liners when special or hazardous waste is contained. Based on the borings submitted and the lack of soil information (permeabilities, ion exchange capacity and grain size analysis) it is impossible to determine whether this site would ever be feasible for disposal or storage of hazardous waste. Protection of ground and surface waters is the main concern of the Agency. Given the existing conditions at your facility we can not be assured that the site will be developed and/or operated so as to not cause a violation of the Illinois Environmental Protection Act and the Rules and Regulations (Rule 207-a\*).

8. A schedule for removal of the baghouse dust shall be submitted to the Agency. The removal shall be conducted in accordance with the Agency's Supplemental Permit System and Manifest System (Rule 302-b, of Chapter 9: Special Waste Hauling Regulations, Rule 210\*).
9. The monitoring program as submitted is inadequate. The background well shall be placed at least 400 feet upgradient from the impoundments and the downgradient wells shall be placed 20 - 50 feet downgradient from the impoundments. Well screens shall intercept the water table (5 foot above and below) (Rule 207-a\*).

Based on the above conditions, the Agency must deny the permit.

Be assured of our willingness to cooperate with you in every way possible, should you desire to submit a reapplication. Please contact this office regarding a schedule for removal of the baghouse dust waste from the impoundments.

Very truly yours,



Linda J. Kissinger  
Environmental Protection Specialist  
Residual Management Section  
Division of Land/Noise Pollution Control

LJK:bb

cc: Northern Region  
James F. Kahle

\* Chapter 7, Illinois Pollution Control Board Rules and Regulations, adopted July 27, 1973.